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August 6, 2024

**VIA ECF**

Hon. Jennifer Willis  
United States Magistrate Judge  
Southern District of New York  
40 Foley Square, Room 425  
New York, NY 10007

Re: **Request for Adjournment of Class Certification Motion Briefing**  
**Avchukov et al v. Avant Gardner, LLC et al., 1:23-CV-08106-VM**  
**Brockmole et al v. EZ Festivals LLC et al., 1:23-CV-08106-VM**

Dear Magistrate Judge Willis,

On behalf of Plaintiffs in the above-referenced matters, we write to request an adjournment of the deadline for Plaintiffs' motion for class certification, which is presently due on August 8, 2024. We are requesting this extension due to scheduling issues that have arisen for Plaintiff's counsel. We have not previously requested any extensions of this deadline. Counsel for Defendants has consented to this request.

Accordingly, we request the following briefing schedule:

Plaintiffs' opening brief:	August 29, 2024
Defendants' opposition:	September 30, 2024
Plaintiffs' reply brief:	October 18, 2024

We are available at your convenience if you have questions on this matter.

Respectfully submitted,

  
Shelly L. Friedland